

# Allegheny County Health Department

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November 10, 1993

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Mr. Richard Dworek  
General Manager - Environmental Affairs and Air Management  
U. S. Steel Group, a unit of USX Corporation  
600 Grant Street, Room 2287  
Pittsburgh, PA 15219-2749

Dear Mr Dworek:

This letter is a follow-up to the meeting held on June 4, 1993 during which representatives of USX Corporation and the regulatory agencies who are parties to the Second Amended Clairton Consent Decree discussed a program for collecting and analyzing samples of quench water ("the program") at the Clairton Coke Works.

At the June 4 meeting, USX agreed to participate in such a program and asked the agencies to outline the program in writing. This letter is intended to provide the requested outline.

The principal features of the program will be as follows:

1. Samples of quench water will be jointly collected by USX and the agencies from the pipeline headers feeding water to each of the five quench towers. Samples will be collected on six separate days over approximately a two-month period beginning December 1, 1993.

Since quench towers #1 and #3 share a common feed pipe, quench water samples from four locations will be collected on each of the six days of sampling.

2. Samples of river water will be jointly collected by USX and the agencies on each of the six days that quench water samples are collected. The samples will be collected from the river water intake system.

3. The specific dates and times for collecting the samples will be determined by the agencies. No advance notice will be given to USX regarding these dates and times. An agency representative will make six unannounced visits to the Clairton Works. The agency representative will, upon arrival at the plant, contact a designated USX representative to jointly collect the samples for that day.
4. Samples from each of the five sampling locations (i.e., the four quench water sampling locations specified in paragraph 1 and the river water sampling location specified in paragraph 2) will be collected and treated in accordance with the applicable requirements of the EPA Methods specified in paragraph 5, below, and the requirements for containers, preservation techniques, and holding times specified in 40 CFR §136.3, Table II. Each sample will be split immediately after proper collection and treatment; one-half of the sample for USX and the remaining one-half for the agencies. Over the course of the testing program, a total of 30 sets of samples will be taken from the five sampling locations (i.e., five sets of samples will be taken from each sampling location on each of the six days of sampling). The agencies will analyze 15 sets of samples and USX will analyze the remaining 15 sets of samples.
5. Unless USX and the agencies agree in writing to use another approved method, each sample will be collected and analyzed for the following pollutants in accordance with the indicated EPA Method:

<u>Pollutant</u>	<u>EPA Method</u>
Alkalinity	310.2
Ammonia	350.1
Arsenic	206.2
Benzene	624
Benzo(a)pyrene	610*
Chemical oxygen demand	410.4
Cyanide	335.3
Hydrocarbons (total)	615
Lead	239.2

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<u>Pollutant</u>	<u>EPA Method</u>
Mercury	245.2
Napthalene	610*
Phenanthrene	610*
Phenols	420.2
PH	150.1
Solids (total dissolved)	160.1
Solids (total suspended)	160.2
Solids (total dissolved and suspended)	160.3

*\*Also identify any other significant peaks.*

6. Copies of all analytical results will be provided to all parties within 30 days of collecting the final set of samples.

Please contact me if you have any general questions about the program. Contact Ms. Patty Miller of DER at 442-4064 if you have any questions about the test methods.

Very truly yours,

  
Charles J. Gbetz  
Assistant County Solicitor

CJG:mh

cc: K. Junker  
D. A. Servis  
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D. E. Street



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November 30, 1993

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Re: County Letter of November 10, 1993, re quench water

Gentlemen:

As agreed in my telephone conversation with Charlie Goetz on November 18th, this letter will discuss the problems that USS has with the proposed program for collecting and analyzing samples of quench water and river water at Clairton Works:

1. The commencement date of December 1, 1993, is not possible in view of the need to resolve USS' problems with the program. Charlie and I concurred that as soon as we reach agreement on the problems, we can agree on a commencement date.



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2. Item No. 3 of the program specifying six unannounced visits to collect samples presents serious problems to Clairton. There is an implication that USS would somehow temporarily improve the quench water if it had advance notice. USS takes offense at any suggestion that it would attempt to deceive the agencies. In addition, there is no way to temporarily improve the quench water. Finally, there are substantial practical problems with the proposal outlined in item No. 3 of the program.

Testing and sampling at Clairton is done by a contractor, Chester. One Chester employee stationed at Clairton is assigned to do all NPDES water sampling and flow measurements and is the optimum person to do the sampling under this program because he is familiar with EPA test methods and water sampling. He spends all day Mondays and Tuesdays on NPDES sampling and spends most of Wednesdays on flow measurements. He would be available to do the sampling of this program on Thursdays or Fridays. The only alternative to this employee would be to assign a different Chester employee but that could only be done on a minimum of 24 hours' advance notice since he would be coming from a Chester office which sends employees out on various jobs.

Also, in view of the need to have ready all equipment required by EPA regulations (bottles, preservatives, etc.), and in view of safety considerations, the sampling should be done during daylight hours of a regular work day.

USS would appreciate the provision being changed to state that all sampling will be done on Thursday or Friday of any week between 7 A.M. and 4 P.M. If that change is made, USS would have no objection to the agency visits on those days being unannounced as long as it is understood that the agency representative would have to wait until the USS representative is located and arrives for the sampling to begin. A notice of an hour or so could avoid that waiting period.

3. In the list of pollutants to be analyzed, there are four pollutants for which there is no water quality standard. Therefore, those pollutants are not relevant to any consideration of compliance with the standard in Article XX at Section 520.H, and should be deleted from the list. The four pollutants are chemical oxygen demand, hydrocarbons (total), solids (total suspended) and solids (total dissolved and suspended).





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[Prior to a complete consideration of the proposed program, USS discussed with Patty Miller of DER the applicability of EPA Method 615 to analyzing for hydrocarbons (total) and she has now advised that the correct test method is EPA Method 418.1. This change is no longer relevant in view of our request to delete this pollutant.]

4. USS believes the requirement for some analyses to "Also identify any other significant peaks." is ambiguous. Who decides what is a "significant" peak? Charlie suggested that this problem also be discussed with Patty Miller and USS will do so.

Please let me know your response to our problems with the proposed program.

Very truly yours,



Dorothy A. Servis

DAS:jrp

cc: Mr. Richard Dworek  
Mr. Ronald McCollum  
Stephan K. Todd, Esquire

